

EXHIBIT 84

Affidavit of Daphne Noble

1. My name is Daphne Noble and I make this declaration based on my personal knowledge.
2. I received a Bachelors in Education in 1998 from Eastern Kentucky University and received a Rank I in Educational Leadership Principal All Grades in 2009 from Union College.
3. I have 26 years experience working in Pre-K-12 education.
4. I have been the principal at Breathitt High School since September 2022.
5. Prior to this, I held the positions of teacher from 1999 to 2019 and assistant principal from 2019 to 2022 at Breathitt High School.
6. In my position as principal, I oversee the staff at Breathitt High School, disciplinary measures related to student use of social media, and implementation various methods of attempting to prevent and/or limit students' use of social media during instructional hours.
7. For the 2023 – 2024 school year, we instituted a new policy that cell phones would be stored in caddies during instructional time to attempt to decrease student use of social media. My staff of approximately 12 staff members and I each spent approximately 4 hours considering, developing, and finalizing this policy.
8. For the 2024 – 2025 school year, we developed a new cell phone policy to attempt to decrease student use of social media during instructional hours. My staff of approximately 12 staff members and I each spent approximately 4-6 hours considering, developing, and finalizing this policy.
9. Breathitt High School uses a database to track disciplinary infractions. However, infractions that are handled in the classroom are not entered into this database. The majority of the time, infractions involving social media use during instructional time are handled in this manner and thus are not reflected in our database.

10. Currently, addressing the effects of social media on our students, including on their attention span, is one of the biggest challenges that we address as principals, assistant principals, and administrators at Breathitt High School. Nearly every student who walks into our school is dealing with an issue related to social media. Accordingly, a substantial amount of my work time and the work time of my assistant principals is spent addressing the fallout of social media's negative impact on students.

11. In my experience, I have seen a growing problem of compulsive and problematic use of social media among our students. We face a constant battle in separating students from their phones as students use methods to circumvent our attempts to limit their exposure to social media during instructional time.

12. The time that I have to spend on social media related impacts on students has substantially increased in the nearly 6 years that I have worked as an assistant principal or principal at Breathitt High School.

13. When I first started as an assistant principal in July 2019 I spent approximately 10% of my time on social media related concerns.. By 2020, that number had risen to around 15%. Now in 2025, I spend anywhere from 30-35% of my work time addressing social media issues.

14. Because of the amount of time that I now spend addressing social media impacts on students, I have less time to dedicate to other aspects of my job. For example, instead of spending time in classrooms supporting teachers and student learning, I spend much time meeting with parents about problems their students have involving social media or communicating with parents about attendance because their child does not want to come to school because of a comment posted on social media. Instead of spending time mentoring new teachers, I may have to be part of the team that conducts threat assessments or works with law enforcement because a comment/threat was made by a student on social media. Instead of

providing tutoring sessions with groups of students, I will be needed in the office to meet with students that have been reported to fight because messages were posted on social media.

15. Moreover, while having additional teaching aides would be helpful in addressing the negative impacts that the rising use of social media has had on students, the Breathitt School District has not been able to increase teaching aid hiring commiserate with the needs of the student population that has been negatively impacted by social media due to funding constraints.

16. I regularly interact with the assistant principals at Breathitt High School. Based on these interactions, it is my understanding that my experience is representative and that my assistant principals also spend a substantial portion of their days addressing social media related concerns and that the amount of time assistant principals have had to spend on social media related concerns has increased substantially over the last several years.

17. I am the only principal/assistant principal who was employed at Breathitt High School in 2019 and 2022 as my prior assistant principal retired in 2023. The assistant principal(s) for Breathitt High School were added in 2023 and they have reported to me that in or around 2023, approximately 30% of their time was spent on social media related concerns and that now in 2025 they spend anywhere from 30 -35% of their work time addressing social media issues.

I declare under penalty of perjury that the foregoing is true and correct. Executed on

____ May 2____, 2025.



Daphne Noble